Michael R. McDonald, Esq. Kate E. Janukowicz, Esq. **GIBBONS PC**

One Gateway Center Newark, NJ 07102 Tel: (973) 596-4500

Attorneys for Samsung Electronics America, Inc.

Eric C. Bosset*

COVINGTON & BURLING LLP

One City Center 850 Tenth Street, NW Washington, D.C. 20001 Telephone: (202) 662-6000 *admitted *pro hac vice*

Simon J. Frankel*

COVINGTON & BURLING LLP

One Front Street, 35th Floor San Francisco, CA 94102 Telephone: (415) 591-6000 *admitted *pro hac vice*

Attorneys for Samsung Electronics America, Inc.

UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

THOMAS ROGER WHITE, JR. and PATRICIA CAULEY on behalf of themselves and all others similarly situated,

Plaintiffs.

v.

SAMSUNG ELECTRONICS AMERICA, INC. and SONY ELECTRONICS INC.,

Defendants.

Civil Action No. 17-1775 (MCA) (JAD)

Document Electronically Filed

[PROPOSED] ORDER

THIS MATTER, having been opened to the Court by Defendant Samsung

Electronics America, Inc. ("SEA"), by its attorneys, Gibbons P.C. and Covington &

Burling LLP, to compel arbitration and strike Plaintiffs' class claims; and the Court having considered the papers in support thereto; and good cause having been shown:

IT IS on this ___ day of _____, 2020;

ORDERED that Defendant SEA's motion to compel individual arbitration is hereby **GRANTED**; and it is further

ORDERED that Plaintiffs' class claims are stricken from the Complaint; and it is further

ORDERED that the case is **DISMISSED**.

Hon. Madeline Cox Arleo, U.S.D.J.